



SHAWN RAITER

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January 9, 2020

Via ECF

Magistrate Judge Elizabeth Cowan Wright

United States District Court

342 Federal Building

316 N. Robert Street

St. Paul, MN 55101

Re: Rocco Ciofoletti, et al. v. Securian Financial Group, Inc., et al.
Case No. 18-cv-03025 (JNE/ECW)

Dear Magistrate Judge Wright:

The Securian defendants write to request a short telephone conference with the Court today to address pressing scheduling issues.

The Court currently has a settlement conference scheduled for January 29 in St. Paul. Securian has noticed the depositions of the Ciofolettis and Mr. Stospal. The deposition of Mr. Stospal is scheduled for **tomorrow**, January 10, 2020. Mr. Stospal and one or more of his attorneys will be flying to Minnesota for that deposition.

Yesterday, counsel for newly-added defendant, Shurwest, made their appearance and filed a notice of stay issued in a South Carolina federal court. See Docket No. 102. In that notice, Shurwest contends that a stay issued in a receivership matter involving entities and persons that are not parties to this lawsuit has effectively stayed this Minnesota action. Following Shurwest's appearance, counsel for the plaintiffs in this action forwarded the Ciofoletti and Stospal deposition notices and indicated that the witnesses would not be voluntarily produced for more than one deposition.

Because of these developments, Securian believes it would be beneficial for the parties to speak with the Court about how to proceed. We understand that this is short notice and appreciate the Court's attention.



Very truly yours,

LARSON • KING, LLP

s/Shawn M. Raiter

SHAWN M. RAITER

SMR:lcb

cc: All Counsel of Record (via ECF)